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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JULIE LYNN FRY,)
13 Plaintiff,) CASE NO.
14 v.) 2:23-cv-00891-RFB-VCF
15 KILOLO KIJAKAZI, ACTING) **UNOPPOSED MOTION**
16 COMMISSIONER OF SOCIAL SECURITY,) **FOR EXTENSION OF TIME TO FILE**
17 Defendant.) **PLAINTIFF'S BRIEF**
18 _____)
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16 Plaintiff, Julie Lynn Fry, by her attorney, moves for a sixty (60) day extension of time to
17 file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed October 16,
18 2023.

20 Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel
21 requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance,
22 between October 6, and December 8, 2023, staff in Counsel's office have one hundred and
23 ninety (190) Plaintiff briefs due. This figure does not include oral arguments, appeals to Circuit
24 Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout
25 the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly
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1 prepare the brief by the current deadline. This request will not cause Defendant any undue
2 hardship. This extension is needed to thoroughly and properly prepare the brief.

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4 Wherefore, Plaintiff requests an extension from October 16, 2023, up to and including
5 December 15, 2023 to file her brief. Counsel for the Plaintiff has conferred with Defendant's
6 Counsel who kindly has no objection to this request.

7 Dated October 10, 2023.

8
9 Respectfully submitted,

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11 /s/Hal Taylor
12 Hal Taylor, Esq.

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14 **Plaintiff's Certificate of Service:**

15 I certify that I caused the Unopposed Motion for Extension of Time to be served today,
16 October 10, 2023, by CMECF to Blaine T. Welsh, Esq., and Franco Bacia, Esq., who are filing
17 users of the CM/ECF system.

18
19 /s/Hal Taylor
20 Hal Taylor

21
22 IT IS SO ORDERED.

23
24 
25 Cam Ferenbach
26 United States Magistrate Judge
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DATED 10-12-2023